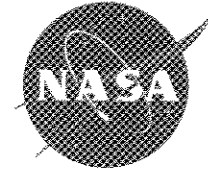


National Aeronautics and Space Administration
Langley Research Center
100 NASA Road
Hampton, VA 23681-2199



February 21, 2012

Reply to Attn of: 30

TO: Distribution

FROM: Chief Counsel

SUBJECT: Blanket Determination Regarding Attendance at the American Institute of Aeronautics and Astronautics (AIAA) and Science & Technology Corporation (STC) President's Day Reception with Congressmen Rob Wittman and Bobby Scott at the Virginia Air and Space Center on February 23, 2011, from 4:00 p.m. to 6:30 p.m.

The AIAA and STC are hosting a meeting and reception with local Hampton Roads Congressmen Rob Wittman and Bobby Scott at the Virginia Air & Space Center IMAX Theater on February 23, 2011, from 4:00 p.m. to 6:00 p.m. Senior leaders and representatives from private industry, academia, and local, state, and federal government officials have been invited. Several NASA leaders and employees have been invited to attend the event. The purpose of the event is to allow community leaders to interact and discuss with Virginia Congressmen the outlook for Hampton Roads in Congress in 2012, including NASA's significant role in aeronautics, science, and exploration in the region. I have determined it to be in the best interest of the government for those invited NASA employees to attend this event in their official capacities and as representatives of NASA.

The reception will be a widely attended gathering attended by numerous federal, Commonwealth, and local government representatives, members of academia, and local business leaders. Approximately 200 people are expected to attend. NASA invitees will have the opportunity to further Agency programs and operations through meeting with key local public officials, local business leaders, Virginia Congressmen Wittman and Scott, other federal leaders, and members of academia who have an interest in the outlook for Hampton Road's in the 112th Congress, including the outlook for NASA. The estimated per person value of the reception, which includes food and beverages, is \$20.00 per person. In accordance with 5 C.F.R. §2635.204(g), and 14 C.F.R. §1207.103, I find that the event meets the definition of a widely attended gathering and in light of NASA's involvement in space and aeronautics research activity impacting the Hampton Roads community and Commonwealth, I conclude that NASA's interest in its employees attending this event outweighs any concern that attendance and accepting the food and beverage offered may, or may appear to, improperly influence any NASA personnel in the performance of their official duties.

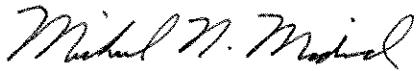
Accordingly, NASA LaRC employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for an accompanying spouse or guest.

NASA employees whose duties may substantially affect AIAA or STC are not covered in this determination and should seek from their local ethics counselor a determination pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in these events.

NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the reception and mementos for themselves and any accompanying guest.

NASA employees attending such events who are offered separate gifts are reminded of the \$20.00 gift exception at 5 C.F.R. § 2635.204(a). The exception provides that Federal Government Executive Branch employees may accept gifts valued at \$20.00 or less per source per occasion (and no more than \$50.00 total value from one source in a calendar year). NASA employees should not accept any gift, including food and refreshments, which exceeds \$20.00 in value from one source on each occasion a gift is offered by the source and should not accept any gift that will result in exceeding the \$50.00 calendar year limit for gifts from one source.

Questions about this determination may be addressed to Pete Polen at 757-864-3225.

A handwritten signature in cursive script, reading "Michael N. Madrid".

Michael N. Madrid
Deputy DAEO